

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANGELICA JUNIOUS,

Plaintiff,

v.

W. BAKER, et al.,

Defendants.

No. 1:22-cv-03681

Judge Edmond E. Chang

Magistrate Judge Maria Valdez

SGT. BAKER'S UNOPPOSED MOTION TO JOIN DEFENDANTS PURCELL, CHENGARY, WALZ, AND RAHN'S MOTION FOR EXTENSION OF TIME

Defendant Sgt. William Baker (“Sgt. Baker”), by his attorney, Kimberly M. Foxx, State’s Attorney of Cook County, through her Assistant State’s Attorney, Miguel E. Larios, and for his unopposed motion to join Defendants Purcell, Chengary, Walz, and Rahn’s motion for extension of time to file his reply in support of Defendants’ motion to stay, up to and including September 27, 2023 (dkt. 122), Sgt. Baker states the following:

1. Sgt. Baker is presently represented by Assistant State’s Attorney Miguel E. Larios from the Conflicts Counsel Unit.
2. As explained in his second supplemental brief in support of the motion to stay the proceedings, the CCSAO is tendering Sgt. Baker’s representation to outside counsel in this case going forward. (Dkt. 116).
3. A petition for appointment of a Special State’s Attorney to represent Sgt. Baker has been filed in the Circuit Court of Cook County, and that petition is up for

presentment on the morning of September 18, 2023.

4. Once appointed by the Court, new counsel for Sgt. Baker can appear and file his reply. As the Court has already seen, private counsel has been obtained for the other defendants as well: Defendants Cook County and Sheriff Dart will be represented by DeVore Radunsky LLC, while Defendants Chengary, Purcell, Rahn, and Walz will be represented by Tribler, Orpett & Meyer, P.C. (Dkt. 118, 122).

5. Defendants' reply in support of their motion to stay is currently due on September 13, 2023.

6. In light of the fact that new counsel is expected to be appointed shortly, Sgt. Baker respectfully requests a short extension of time, up to and including September 27, 2023, to file his reply.

7. This is the same extension sought by Defendants Cook County and Sheriff Dart which was granted by the Court, so all Defendants will have the same deadline to reply. (Dkt. 119).

8. On September 13, 2023, counsel for Sgt. Baker emailed Plaintiff's counsel regarding the proposed extension of time to file Sgt. Baker's reply. Plaintiff's counsel indicated that they did not object to the proposed extension of time.

9. No party will be prejudiced by the granting of this motion. This motion is brought in good faith and not for any improper purpose.

WHEREFORE, Defendant Sgt. William Baker respectfully requests that this Honorable Court grant Sgt. Baker an extension of time, up to and including September 27, 2023, to file his reply in support of Defendants' motion to stay, and grant such other relief that this Court deems just.

Dated: September 13, 2023

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

/s/ Miguel E. Larios

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Counsel for Defendant Sgt. William Baker

CERTIFICATE OF SERVICE

The undersigned certifies that on September 13, 2023, he filed the foregoing document using the CM/ECF e-filing system with the Clerk of the Court for the United States District Court for the Northern District of Illinois, which will notify counsel of record of this electronic filing.

/s/ Miguel E. Larios